



# MAGELLAN

DEVELOPMENT GROUP

October 13, 2016

**Via Overnight Federal Express and Email**  
**(CELA@fec.gov)**

Ms. Donna Rawls  
Federal Election Commission  
Office of Complaints Examination and  
Legal Administration  
999 E Street, NW  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
2016 OCT 14 AM 11:43  
OFFICE OF GENERAL  
COUNSEL

Re: MUR 7141


Dear Ms. Rawls,

Our office in receipt of your correspondence dated September 30, 2016 regarding a complaint against Magellan Development Group LLC ("Magellan") and a potential violation of Federal Election Campaign Act of 1971 (the "Act"). Pursuant to your conversation with Laura Buel (our Chief Financial Officer) on October 12, 2016, please let this letter serve as our response.

Magellan has four principals- Joel M. Carlins, David M. Carlins, James Loewenberg and Robin Tebbe. Each of these principals is an American citizen. Magellan has made political contributions to local politicians and has not made any contributions to any presidential campaign. To the extent any executives made any political contributions, such contributions were made with their personal funds and were not reimbursed by Magellan.

To the extent you require additional information or have any questions, please feel free to call either me or Laura Buel at (312) 642-8869. Thank you.

Sincerely,



Kimberly J. Sharon  
General Counsel for Magellan Development Group LLC



T 312.469.8100 F 312.642.2773 • MAGELLANDEVELOPMENT.COM  
225 N COLUMBUS DR, SUITE 100 • CHICAGO, ILLINOIS 60601